

**LITE DEPALMA GREENBERG
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION

Relating to: Other Labs Track

Case No.: 2:19-MD-02904-MCA-MAH

MDL 2904

**JOINT NOTICE OF MOTION
TO SEAL PURSUANT TO
LOCAL RULE 5.3**

PLEASE TAKE NOTICE that, on February 5, 2024, or a date and time to be set by the Court, Plaintiffs Gwendolyn Anderson and Tonda Tate and Defendants Sonic Healthcare USA, Aurora Diagnostics, LLC, Clinical Pathology Laboratories, and Austin Pathology Associates shall move jointly before Hon. Madeline Cox Arleo, U.S.D.J., at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for the entry of an order, pursuant to Local Civil Rules 5.3(c) permitting redactions or permanently sealing Exhibits K, L, and M annexed to the December 8, 2023 letter from Joseph J. DePalma, Esq., to Hon. Mark Falk (Ret.), as well as Exhibits H, I, J, K, and L annexed to the December 22, 2023 response letter from Bradley J. Bartolomeo. (Dkt. Nos. 627 and 633 respectively).

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, the parties shall rely upon the Declaration of Catherine B. Derenze in support of the Joint Motion to Seal Materials, and exhibit attached thereto. A proposed Findings of Fact and Conclusions of Law and Order Granting the Motion to Seal is also submitted for the Court's consideration.

PLEASE TAKE FURTHER NOTICE that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: December 28, 2023

LITE DEPALMA GREENBERG & AFANADOR, LLC

/s/ Joseph J. DePalma
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CERTIFICATE OF SERVICE

I, Joseph J. DePalma, hereby certify that on this day, true and correct copies of the following documents were served on all counsel of record via the Court's ECF system (1) Joint Notice of Motion to Seal Pursuant to Local Rule 5.3; (2) Declaration of Catherine B. Derenze in Support of Joint Motion to Seal Pursuant to Local Rule 5.3; and (3) Proposed Findings of Fact and Conclusions of Law, and Order Granting Motion to Seal.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: December 28, 2023

/s/ Joseph J. DePalma
Joseph. J. DePalma